

EXHIBIT B

EXHIBIT B – APPLE’S WITNESS LIST

Pursuant to the Scheduling Order (Dkt. 111), the Civil Local Rules (Civ. L.R. 16.1.f.2.c), and the Federal Rules (Rule 26(a)(3)(i)), Apple hereby provides the names and addresses of its prospective witnesses, except impeaching witnesses, and, in the case of expert witnesses, a brief narrative statement of qualifications of such witness and the substance of the testimony which such witness is expected to give. Apple also reserves the right to call any witness on Plaintiff’s list.

WILL CALL WITNESSES

Name	Address
Anthony Acampora, Ph.D.	University of California, San Diego Dept. of Electrical and Computer Engineering and Center for Wireless Communications Engineering Building Unit One MC 0409, Room 6606 9500 Gilman Drive La Jolla, CA 92093-0409 c/o Cooley LLP 3175 Hanover Street Palo Alto, CA 94304
Carl Andren	906 South Ramona Ave. Indialantic, FL 32903
Frank Casanova	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 c/o Cooley LLP 3175 Hanover Street Palo Alto, CA 94304

Name	Address
Benjamin Goldberg, Ph.D.	Courant Institute of Mathematical Sciences Department of Computer Science New York University 251 Mercer Street New York, New York 10012 c/o Cooley LLP 3175 Hanover Street Palo Alto, CA 94304
Dominique Hanssens, Ph.D.	Professor of Marketing UCLA Anderson School of Management 110 Westwood Plaza, Suite B417 Los Angeles, California 90095 c/o Cooley LLP 3175 Hanover Street Palo Alto, CA 94304
Matthew Lynde, Ph.D.	Senior Vice President Cornerstone Research Two Embarcadero Center, 20th Floor San Francisco, California 94111 c/o Cooley LLP 3175 Hanover Street Palo Alto, CA 94304
Heather Mewes	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 c/o Cooley LLP 3175 Hanover Street Palo Alto, CA 94304
Hyung Myung, Ph.D.	QUALCOMM Inc. 5775 Morehouse Drive San Diego, CA c/o David Kays Morgan Franich Fredkin Siamas & Kays LLP 333 W. San Carlos Street Suite 1050, San Jose, CA 95110

Name	Address
Sachin Sane	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 c/o Cooley LLP 3175 Hanover Street Palo Alto, CA 94304

MAY CALL WITNESSES

Name	Address
Sami Almalfouh	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 c/o Cooley LLP 3175 Hanover Street Palo Alto, CA 94304
Supriya Gujral	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 c/o Cooley LLP 3175 Hanover Street Palo Alto, CA 94304
Michael Jaynes	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 c/o Cooley LLP 3175 Hanover Street Palo Alto, CA 94304
Peter Karabinis, Ph.D.	Odyssey Wireless, Inc. c/o McKool Smith

Name	Address
Robert Love	Motorola c/o Amr Aly Mayer Brown 1221 Avenue of the Americas New York, NY 10020 (212) 506-2304

EXPERT NARRATIVES

Dr. Anthony Acampora: A description of Dr. Acampora's qualifications and the substance of the testimony he is expected to give can be found in his June 30 and July 27, 2016 reports in this case, as well as his deposition.

In brief, from 1988 to the present, Dr. Acampora has worked as a Professor and Professor Emeritus of Electrical Engineering and Director of telecommunications institutes at Columbia University and at the University of California, San Diego. Dr. Acampora worked from June 1968 through September 1988 at AT&T Bell Laboratories in various engineering, research, and managerial positions, all in the general area of telecommunications. Dr. Acampora has a Bachelor of Science, Master of Science, and Doctor of Philosophy degrees, all in Electrical Engineering.

Dr. Acampora is expected to give testimony regarding the invalidity of the asserted claims, including testimony addressing the failure of the patents-in-suit to teach the asserted claims, the state of the prior art before Odyssey's alleged invention, anticipation, obviousness including secondary considerations, Odyssey's alleged invention date, and Odyssey's claim of priority to the July 2005 provisional application. Dr. Acampora is also expected to provide testimony responding to Dr. Chiang's infringement analysis, including testimony regarding the accused portions of the LTE standard relating to the LTE uplink, the operation of the accused products, and Dr. Chiang's failure to present consistent validity and infringement

1 theories. Dr. Acampora is also expected to provide testimony rebutting Dr.
2 Chiang's damages-related opinions regarding the alleged benefits of the asserted
3 claims over the prior art and in light of noninfringing alternatives. Dr. Acampora is
4 expected to provide testimony regarding the patents provided in certain licenses
5 entered into by Apple. Dr. Acampora is further expected to provide a technology
6 tutorial and testimony regarding the patents-in-suit.

7 **Dr. Benjamin Goldberg:** A description of Dr. Goldberg's qualifications and
8 the substance of the testimony he is expected to give can be found in his July 27,
9 2016 report in this case, as well as his deposition.

10 In brief, from 1994 to the present, Dr. Goldberg has been a tenured Associate
11 Professor in the Department of Computer Science. From 1987 to 1994, he was an
12 Assistant Professor in the Department of Computer Science at New York
13 University. He has a Bachelor of Arts degree in Mathematical Sciences, Master of
14 Science and Master of Philosophy degrees in Computer Science, and a Doctoral
15 degree in Computer Science.

16 Dr. Goldberg is expected to give testimony regarding the operation of the
17 accused Apple products, including a source code evaluation and a MATLAB
18 simulation of the LTE uplink.

19 **Dr. Dominique Hanssens:** A description of Dr. Hanssen's qualifications
20 and the substance of the testimony he is expected to give can be found in his July
21 27, 2016 report in this case, as well as his deposition.

22 In brief, Dr. Hanssens is a Research Professor of Marketing at the UCLA
23 School of Management, where he has served on the faculty since 1977. He has
24 consulted and performed research on a variety of marketing and survey-related
25 topics. He received Ph.D. and M.S. degrees in Management from Purdue
26 University and a Licentiate from the University of Antwerp in Applied Economics.

27 Dr. Hanssens is expected to give testimony regarding the flaws in the
28 opinions offered by Odyssey's expert Dr. Scott Savage, including the unrealistic

1 and unfounded assumptions in Savage's analysis, the lack of robust, reliable results,
2 Savage's failure to present real-world decisions to the respondents, the inability of
3 the survey respondents to understand the upload speed metrics being analyzed, and
4 the failure to account for the many unaccused features in the accused products,
5 among many other problems with the Savage analysis. Dr. Hanssens is also
6 expected to give testimony regarding his surveys, including the knowledge survey
7 and the performance survey. Dr. Hanssens is further expected to give testimony
8 rebutting the opinions of Odyssey's expert Mr. Bradford Armstrong, including
9 testifying regarding Mr. Armstrong's failure to follow a scientific method, to
10 separate download and upload speeds, and to examine the impact of carriers, as
11 well as Mr. Armstrong's misinterpretation of the consumer survey data.

12 **Dr. Matthew Lynde:** A description of Dr. Lynde's qualifications and the
13 substance of the testimony he is expected to give can be found in his July 27, 2016
14 report in this case, as well as his deposition.

15 In brief, Dr. Lynde is a Senior Vice President of Cornerstone Research, an
16 economic and financial consulting firm. He has more than 35 years of experience
17 as a practicing applied economist in academia, government, and business. He
18 received his Ph.D. from Berkeley, addressing research regarding an empirical,
19 econometric investigation of the impact of technological innovation on international
20 competition.

21 Dr. Lynde is expected to give testimony responding to the damages opinions
22 offered by Odyssey's expert Roy Weinstein, including Mr. Weinstein's improper
23 estimation of the value of LTE, his inappropriate comparison between 3G and 4G,
24 his mistaken assumptions regarding the contribution of standard-essential patents
25 (SEPs) to the value of smartphones, his improper use of a 10/84 multiplier, his
26 failure to account for the differences between iPads and iPhones, his improper use
27 of willingness-to-pay as the basis for the hypothetical negotiation, his use of the
28 flawed Savage survey, his failure to properly analyze how the alleged calculations

1 would be divided in a hypothetical negotiation, and further modifications required
2 for any application of the Weinstein damages theories. Dr. Lynde is also expected
3 to testify regarding an application of the Georgia-Pacific factors, certain Apple
4 license agreements that are comparable to the hypothetical negotiation in this case,
5 and a smallest-salable-unit analysis.

6 Apple reserves the right to call live, by video, or by deposition any witness
7 on this list or any of Plaintiff's witnesses. Apple expressly reserves the right to
8 supplement, augment, or otherwise modify this list based on circumstances as they
9 may evolve prior to the commencement of trial.